

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

HAMID HASSAN RAZA; MASJID AL-ANSAR;
ASAD DANDIA; MUSLIMS GIVING BACK;
MASJID AT-TAQWA; MOHAMMAD
ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R.
BLOOMBERG, in his official capacity as Mayor of
the City of New York; RAYMOND W. KELLY, in
his official capacity as Police Commissioner for the
City of New York; DAVID COHEN, in his official
capacity as Deputy Commissioner of Intelligence
for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen

DECLARATION OF PATRICK TOOMEY, ESQ.

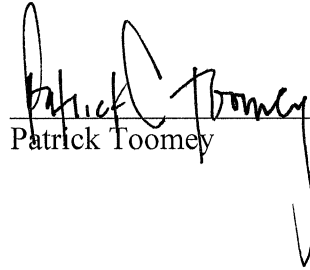
I, Patrick Toomey, a member of the Bar of New York and a member of the bar of this Court, declare under penalty of perjury as follows:

1. I am a staff attorney with the American Civil Liberties Union Foundation, which is counsel for Plaintiffs in this matter. I submit this declaration in support of Plaintiffs' request for an Order to Show Cause permitting expedited discovery in support of a preliminary injunction.
2. Attached hereto as **Exhibit A** is a true and correct copy of Defendants' September 10, 2013 Letter to Magistrate Judge Joan Azrack (Dkt. No. 11).

3. Attached hereto as **Exhibit B** is a true and correct copy of NYPD Intelligence Division, Analytics Unit PowerPoint Presentation, <http://bit.ly/1aITs2A>.
4. Attached hereto as **Exhibit C** is a true and correct copy of NYPD Intelligence Division, *Intelligence Report: Debriefing Initiative*, <http://apne.ws/18Y7xlv>.
5. Attached hereto as **Exhibit D** is a true and correct copy of Adam Goldman & Matt Apuzzo, *Informant: NYPD Paid Me to 'Bait' Muslims*, Assoc. Press, Oct. 23, 2012, <http://bit.ly/1bSo1ye>.
6. Attached hereto as **Exhibit E** is a true and correct copy of NYPD Intelligence Division, *Strategic Posture 2006*, <http://bit.ly/1eEuSNV>.
7. Attached hereto as **Exhibit F** is a true and correct copy of Technical Operations Unit Surveillance Request (Nov. 7, 2008), <http://apne.ws/15fau4D>.
8. Attached hereto as **Exhibit G** is a true and correct copy of NYPD Intelligence Division, Intelligence Analysis Unit, *Intelligence Note* (Oct. 16, 2006), <http://apne.ws/16arHNb>.
9. Attached hereto as **Exhibit H** is a true and correct copy of NYPD Intelligence Division, *Deputy Commissioner's Briefing* (Apr. 25, 2008), <http://apne.ws/17MdnHI>.
10. Attached hereto as **Exhibit I** is a true and correct copy of Adam Goldman & Matt Apuzzo, *NYPD Designates Mosques as Terrorism Organizations*, Assoc. Press, Aug. 28, 2013, <http://bit.ly/15iOA9J>.
11. Attached hereto as **Exhibit J** is a true and correct copy of Office of the Mayor, City of New York, *Proclamation*.

* * *

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge and belief.


Patrick Toomey

Dated: October 8, 2013
New York, New York